

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
10801 W. CHARLESTON BLVD.  
SUITE 500  
LAS VEGAS, NV 89135  
TELEPHONE: 702.369.6800

Anthony L. Martin  
Nevada Bar No. 8177  
[anthony.martin@ogletree.com](mailto:anthony.martin@ogletree.com)

Elody C. Tignor  
Nevada Bar No. 15663  
[elody.tignor@ogletree.com](mailto:elody.tignor@ogletree.com)

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
10801 W. Charleston Blvd.  
Suite 500  
Las Vegas, NV 89135  
Telephone: 702.369.6800  
Fax: 702.369.6888

*Attorneys for Defendant Las Vegas-CJD, LLC DBA  
Sahara Chrysler Dodge Ram*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SHAWNA CHRISTION, an individual,  
  
Plaintiff,

vs.

LAS VEGAS-CJD, LLC, A LIMITED  
LIABILITY COMPANY DOING BUSINESS  
AS SAHARA CHRYSLER DODGE RAM,  
AND DOES 1-50, INCLUSIVE,  
  
Defendants.

Case No. 2:23-cv-00414-APG-VCF

**STIPULATION AND ORDER TO DISMISS  
PLAINTIFF'S SECOND AND FOURTH  
CAUSES OF ACTION IN PLAINTIFF'S  
COMPLAINT**

In accordance with Rule 41(a)(2) of the Federal Rules of Civil Procedure and Local Rule LR  
IA 6-2, Defendant Las Vegas-CJD, LLC DBA Sahara Dodge Ram ("Defendant") and Plaintiff  
Shawna Christion ("Plaintiff") by and through their respective undersigned counsel of record,  
HEREBY STIPULATE AND AGREE:

1. Plaintiff's Second Cause of Action for Retaliation be dismissed with prejudice;
2. Plaintiff's Fourth Cause of Action for Tortious Discharge be dismissed with  
prejudice;
3. Defendant hereby withdraws its Motion for Partial Dismissal of Plaintiff's Second  
and Fourth Causes of Action (ECF No. 9) as it is now moot; and

4. Defendant will file an Answer to Plaintiff's Complaint within 21 days of the Court granting this Order.

Each party is to bear their own fees and costs; however, nothing in this dismissal shall limit or constrain the right of either Plaintiff or Defendant to recover attorney's fees or costs to the extent the law allows the same.

DATED this 13<sup>th</sup> day of April, 2023.

BAIN MAZZA & DEBSKI LLC

/s/ Kathryn L. Bain

Kathryn L. Bain  
Nevada Bar No. 15496  
10300 W. Charleston Blvd., Ste. 13-191  
Las Vegas, NV 89135  
Telephone: 702.919.1090  
*Attorney for Plaintiff Shawna Christion*

DATED this 13<sup>th</sup> day of April, 2023.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART  
P.C.

/s/ Elody C. Tignor

Anthony L. Martin  
Nevada Bar No. 8177  
Elody C. Tignor  
Nevada Bar No. 15663  
10801 W. Charleston Blvd.  
Suite 500  
Las Vegas, NV 89135  
Telephone: 702.369.6800  
Fax: 702.369.6888  
*Attorneys for Defendant Las Vegas-CJD, LLC DBA  
Sahara Chrysler Dodge Ram*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: April 18, 2023